

## Morse, Bob

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**From:** Pensak, Mindy  
**Sent:** Friday, August 10, 2018 11:54 AM  
**To:** Morse, Bob  
**Cc:** Jackson, Amelia; Clemetson, Michael  
**Subject:** RE: Griffiss AFB Revised Draft Basewide PFAS (AFFF) SI Report

Hi Bob,

As per your request, I have reviewed the "Response to Comments" and the revised Red-Lined/Strike-out Text and I have no further comments regarding these documents. As you noted, the resolution to some of my comments was to remove language from the text or concur and note that the purpose of this SI Report was not to conduct any type of ecological risk assessment.

I would appreciate being kept in the loop should a "Follow-On" plan which proposes evaluating ecological risk be submitted.

Thank you,

*Mindy Pensak*

Ecological Risk Assessor  
DESA/HWSB/SST  
732-321-6705 (Mon, Wed, Thur)  
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**From:** Morse, Bob  
**Sent:** Friday, July 27, 2018 4:51 PM  
**To:** Griffiths, Rachel <[griffiths.rachel@epa.gov](mailto:griffiths.rachel@epa.gov)>; Pensak, Mindy <[Pensak.Mindy@epa.gov](mailto:Pensak.Mindy@epa.gov)>; Olsen, Marian <[Olsen.Marian@epa.gov](mailto:Olsen.Marian@epa.gov)>  
**Cc:** Pocze, Doug <[Pocze.Doug@epa.gov](mailto:Pocze.Doug@epa.gov)>; Metz, Chloe <[Metz.Chloe@epa.gov](mailto:Metz.Chloe@epa.gov)>; Nace, Charles <[Nace.Charles@epa.gov](mailto:Nace.Charles@epa.gov)>  
**Subject:** RE: Griffiss AFB Revised Draft Basewide PFAS (AFFF) SI Report

Attached is the below mentioned redline/strikeout from the AF. Its 187 pages. You have it in case you want it.

Bob

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**From:** Morse, Bob  
**Sent:** Friday, July 27, 2018 3:36 PM  
**To:** Griffiths, Rachel <[griffiths.rachel@epa.gov](mailto:griffiths.rachel@epa.gov)>; Pensak, Mindy <[Pensak.Mindy@epa.gov](mailto:Pensak.Mindy@epa.gov)>; Olsen, Marian <[Olsen.Marian@epa.gov](mailto:Olsen.Marian@epa.gov)>  
**Cc:** Pocze, Doug <[Pocze.Doug@epa.gov](mailto:Pocze.Doug@epa.gov)>; Metz, Chloe <[Metz.Chloe@epa.gov](mailto:Metz.Chloe@epa.gov)>; Nace, Charles <[Nace.Charles@epa.gov](mailto:Nace.Charles@epa.gov)>  
**Subject:** RE: Griffiss AFB Revised Draft Basewide PFAS (AFFF) SI Report

Hi all.

I have received the above Site Inspection Report. Note it is called "Revised Draft" rather than "Draft Final" or "Final".

The reason the document is called "Revised Draft" is that it was submitted and resubmitted by the AF to its HQ. From my looking at the Response to Comments (RTC), this mainly appears to have resulted in the deletion of some sections of text that we previously commented on. I don't think there is much new text from their HQ. As with Plattsburgh, much of the RTC refers to the "follow-on work" that will be conducted. It is my understanding that unlike Plattsburgh, the AF has no immediate plans for follow on work, as there are no apparent impacts to drinking water. A very extensive survey conducted by the AF found no private drinking water wells on base or within 4 miles of the former base boundary. I have attached the RTC for your convenience.

As for the Revised SI, I strongly suggest that you understand the AF focus for the document. That focus, and for a final if it is produced, is almost solely on presence /absence of PFAS / AFFF on base.

Much of the nature and extent of contamination, human health risk, and ecological risk text and work would be done in any follow on work, potentially an RI. However, this may not happen until either EPA or NYSDEC / NYSDOH promulgate #s for PFAS.

I suggest your reading the RTC first, to get a sense of what you'll see in this very large document. Hydro comments are first, followed by human health risk and then ecological risk sections. How much time you put in on the SI is up to you, but I'm not sure there is much value or efficiency in getting out your microscopes and spending time providing a large # of specific comments, when many of them would be automatically addressed in a subsequent RI. In my eventual comments to the AF I will include a general comment that in the future, EPA expects that the AF will conduct a full RI, to address all media, and that the RI Report include a detailed nature and extent section, description / discussion of all contaminant sources, a human health risk assessment, and an ecological risk assessment.

As for the RTC, it may appear a little confusing at first. The AF response columns include the initial AF contractor responses, as well as AF HQ's responses to those responses, and then the contractor's revised response.

The major glaring problem I see with the RTC is that it indicates the AF is not currently addressing recreational use of surface waters. I'm not sure if that would change in future documents. It also mentions the lack of any ecological risk #s.

The AF reportedly will be emailing a redline strikeout of the draft / revised draft text. It may be useful for reference, but will be very long. I will forward it to you when I get it.

I have put hard copies of the actual document, the only extras I have, on Marian's and Rachel's chairs.

The actual Report and other documents are on the R Drive at R:\BMORSE\docs\Griffiss AFB\Griffiss PFOS-PFOA\Basewide SI\Report\Revised Draft\AF

I am asking that you submit any comments to me by Friday August 24. Please let me know if you need to let this deadline slip.

I hope this email helps you focus your reviews and ultimately saves you time. I wish you luck and thank you in advance.

Bob